

**RECEIVED**  
UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

2005 OCT 17 P 1:44

JESSIE MAE DAVIS,

JENNIFER P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

vs.

CIVIL ACTION NO.: 3:05cv995-T

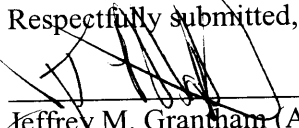
AMERICAN INTERNATIONAL GROUP,  
INC.; AMERICAN GENERAL  
CORPORATION; AMERICAN GENERAL  
FINANCIAL SERVICES OF ALABAMA,  
INC.; MERIT LIFE INSURANCE  
COMPANY; YOSEMITE INSURANCE  
COMPANY; ALICIA ROBINSON;  
PATRICIA PORTER; and Fictitious  
Defendants "A", "B", and "C", whether  
singular or plural, those other persons,  
corporations, firms, or other entities whose  
wrongful conduct caused the injuries and  
damages to the Plaintiff, all of whose true and  
correct names are unknown to Plaintiff at this  
time, but will be substituted by amendment  
when ascertained,

Defendants.

**SPECIAL APPEARANCE - JOINDER AND CONSENT TO REMOVAL**

Defendants American International Group, Inc. ("AIG") and American General Corporation ("AGC"), making a special appearance by and through their counsel of record, appear solely for the purpose of joining in and consenting to the removal of this action to the United States District Court for the Middle District of Alabama, Eastern Division. In so doing, AIG and AGC do not waive and specifically preserve their defense of lack of personal jurisdiction, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Respectfully submitted,

  
Jeffrey M. Grantham (ASB-4866-M66J)

Thomas J. Butler (ASB-7790-T75T)

John Thomas A. Malatesta, III (ASB-4646-O70M)

Attorneys for Defendants American International  
Group, Inc. and American General Corporation

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.  
2400 AmSouth/Harbert Plaza  
1901 Sixth Avenue North  
Birmingham, Alabama 35203-2618  
205-254-1000  
205-254-1999 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by U. S. Mail, postage prepaid, on this the 17<sup>th</sup> day of October, 2005:

C. Lance Gould, Esq.  
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.  
272 Commerce Street  
Montgomery, AL 36104

David Alan Elliott, Esq.  
BURR & FORMAN LLP  
SouthTrust Tower, Suite 3100  
420 – 20<sup>th</sup> Street, North  
Birmingham, AL 35203

  
\_\_\_\_\_  
OF COUNSEL